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***Fine Organic and Environmentally Sustainable Products*****Docket #: TMD-00-02-FR**

Mr. Keith Jones  
 Program Manager  
 National Organic Program  
 USDA-AMS-TMP-NOP  
 Room 2945-So.  
 Ag Stop 0268  
 P.O. Box 96456  
 Washington, D.C. 20090-6456

March 21, 2001

Dear Mr. Jones,  
 ForeTrade, Inc., is an industrial supplier of certified organic spices, coffee and essential oils. As the company's CEO and Co-founder, I would like to submit the enclosed comments to the Agricultural Marketing Service for consideration during its review of the "organic commercial availability of minor ingredients."

Thank you for the opportunity to share my opinions regarding this issue and participate in the comment period.

Sincerely,

*Thomas Fricke*  
 Thomas Fricke  
 CEO & Co-Founder  
 ForeTrade, Inc.

1. If there is commercial availability of organic minor ingredients, the Organic rule should strictly require manufacturers selling organically labeled products to use them. The 5% exception should be clarified that it should only be used rarely and that development and use of organic minor ingredients is the intent of the rule.
2. The US standards should be like the European ones, i.e. manufacturers must provide proof that there is no commercial availability and make appeals to the USDA on a product-specific basis for exceptions of a limited time and scope.
3. If necessary, there should be some standard maximum multiplier as to what would constitute the upper price differential between conventional and organic to establish commercial availability. A multiplier of 3 times conventional would be acceptable and recommended.